

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

NSTAR Electric Company

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D.T.E. 06-40

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Edison Company ("Boston Edison"), Cambridge Electric Light Company ("Cambridge"), Commonwealth Electric Company ("Commonwealth"), and Canal Electric Company ("Canal") (together the "Companies"), d/b/a NSTAR Electric ("NSTAR"), or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If NSTAR or the Companies cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide three copies of each response.
16. The term "Companies" refers to Boston Edison, Cambridge Electric Light Company, Commonwealth Electric Company, and Canal Electric Company. The term "NSTAR" refers to NSTAR Electric Company. Unless the request specifically provides otherwise, the term Companies and NSTAR includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's SECOND SET of discovery in the above referenced docket.

- AG-2-1 Please provide bill impact analyses for each customer class and for each special contract customer for each of the Companies that include the effect of the proposed transmission rates (based on 2005 transmission costs) and, for Cambridge also include the effect of the proposed 13.8 kV transfer from transmission to distribution service. Identify the typical use for each customer class and special contract customer, and provide bill frequency analyses for each class for each of the Companies. Provide the response in the form of working Excel spreadsheet models with all formulae and cell references in tact as well as a hard copy. Include all supporting documentation, workpapers, calculations and assumptions. If and of the Companies redesign any class's rates or the way any costs are allocated to any class, please explain the how the calculations were done and the basis for the changes.
- AG-2-2 Please provide bill impact analyses for each customer class and for each special contract customer for each of the Companies that include the effect of the proposed transmission rates (based on 2005 transmission costs) and, for Cambridge also include the effect of the proposed 13.8 kV transfer from transmission to distribution service and the proposed combined pension adjustment factor. Identify the typical use for each customer class. Provide the response in the form of working Excel spreadsheet models with all formulae and cell references in tact as well as a hard copy. Include all supporting documentation, workpapers, calculations and assumptions.
- AG-2-3 Please provide copies of all contracts between the Companies and customers

(wholesale and retail) for services that include transmission services. Provide the original contracts and all amendments.

- AG-2-4 Please provide copies of all contracts between NSTAR and customers (wholesale and retail) for services that include transmission services. Provide the original contracts and all amendments.
- AG-2-5 For each of the contracts provided in the response to AG-2-4 and AG-2-5, please provide a schedule showing the actual 2004-present monthly bills for each customer and the associated bill determinants. The response should clearly identify the transmission components and provide references to the associated contract pricing provisions. If the contracts refer to tariffs, please identify the specific governing tariff provisions and provide a website reference to the identified provisions. If the monthly billed amount and/or quantity includes an adjustment for a prior period, please provide a detailed explanation of the adjustment and how it was calculated. Provide a working Excel spreadsheet model supporting all calculations.
- AG-2-6 For each of the Companies identify each transmission customer that does not pay for LNS or does not pay for LNS at the same tariffed rate that applies to the Companies' retail customers. Please provide the basis for each deviation from the tariffed rate. Also provide the amount that each customer would have paid during 2005 had that customer paid the tariffed rate. Include all supporting documentation, workpapers, calculations and assumptions. Provide an Excel working model supporting all calculations.
- AG-2-7 Will the Companies amend the contracts for transmission service to reflect new combined transmission rates? If not, please explain why. If yes, when will the amendments be filed and when will they be effective?
- AG-2-8 Please explain, in detail, the steps that NSTAR proposes to take toward combining the rates for all classes. For each step, provide the associated bill impact analyses for each of the Companies.
- AG-2-9 Refer to Exh. CLV-8. Please explain, in detail, how the individual class rate changes were determined. Provide bill impact analyses for each rate class identify the typical use for each class.
- AG-2-10 Refer to Exh. CLV-3, page 80 (Cross Subsidization Verification). Please provide copies of all analyses, all related communications (internal and external), and other documentation supporting the assertions made.
- AG-2-11 Are there any costs related to equipment and facilities utilized in the provision of

transmission service above 13.8kV included in the “13.8kv” facilities that NSTAR proposes to transfer to Cambridge’s distribution service? If yes, please identify by FERC Account number, provide the 2005 costs and identify these costs by annotating Exh. CLV-7.

- AG-2-12 Please provide for 2005 the actual monthly bill determinants for each of the Companies and each customer class including each special contract customer. Provide the response in the form of a working spreadsheet model for each of the Companies with all formulae and cell references intact.
- AG-2-13 Refer to Exh. CLV-1, page 28. Will the proposed transfer of the 13.8 kV revenue requirement from transmission to distribution result in any positive or negative customer bill impacts? If yes, please explain and provide estimates of the impacts by class and all supporting documentation.
- AG-2-14 Refer to Exh. CLV-1, page 26. According to the testimony, NSTAR proposes to transfer the Cambridge 13.8 kV costs to distribution rates effective January 1, 2007 based on estimated 2006 costs. Please explain in detail and illustrate using 2004 and 2005 actual and estimated data, how the charges to customers and true-up of the transmission rate would occur beginning with the January 1, 2007 rate changes and the January 1, 2008 rate change reflecting the true-up of 2006 costs not 2007 actual cost true-up.

DATED: July 6, 2006